can only refer to the license plate reader and not to the use of other portions (barrier gate, exit license plate reader, etc.) as they do not relate to "speed controls" or to "detect stolen cars".

Mehdipour has an entrance license plate reading camera, an exit license plate reading camera, and an exit gate.

He has an _optional_ ticket dispenser 13. _If_ a ticket is issued, its number may be stored along with the license plate number (column 2, lines 34-41).

A printer 36 may print the charges on the ticket (column 2, line 67 - column 3, line 1).

Applicant's claims 1-12 are all method claims. Nevertheless, in terms of _devices_, Mehdipour does not disclose devices to perform the following claim elements and does not perform the functions of these claim elements (quotations are from Applicant's claim 1).

(i) **"at the exit machine, reading the ticket"**

There is no ticket reading machine or function in Mehdipour.

(ii) **"at the exit ... retrieving the data representing the vehicle characteristic associated with the ticket"**

Mehdipour does not use the license plate number associated with the ticket -- as the ticket is optional. He uses a license plate number stored in memory (from the entrance) and compares it to a license plate number read at the exit -- to arrive at the

time the car has been in the garage. But that procedure has
nothing to do with a ticket. Indeed, that is why Mehidpour's
ticket is optional -- because he doesn't use it.

**(iii) "automatically, in a computer system, comparing the
characteristic used in (e) at the exit ... (i.e., the exit
license plate number) ... with the characteristic obtained
in (d) derived from reading the ticket"**

Mehdipour doe not compare license plate numbers with ticket
information -- he only compares license plate numbers at the
entrance and exit.

(iv) "in the event of a mismatch, generating a warning signal"

Mehdipour does not match the license plate read at exit
against ticket information and he has no warning device.

With sufficient modification, using hindsight, a horse and
buggy can be made into a jet airplane. But the issue is not just
of how much the Mehdipour system must be modified, but where in
Mehdipour, or the other cited art, is there any teaching or
motivation to make such modifications. There is no motivation or
teaching in Mehdipour to add extra devices (ticket reading
device, computer software, warning device) which are totally
unnecessary to accomplish Mehdipour's purpose of charging for the
time a car is in a garage. There is no motivation or teaching in

Mehdipour to prevent car theft from a parking area -- he is only concerned with charging for the time the car is parked in a garage.

The Patent Act Section 101(b) specifically provides that "the new use of a known machine" is patentable, as a process (method). Here, even if Mehdipour has disclosed all of Applicant's system (which he did not) the new use, of preventing car thefts, would present patentable subject matter.

In regard to claim 3, Mehdipour does not disclose tickets with printed numbers which are machine-read before being dispensed.

In regard to claims 4 and 5 Mehdipour does not print license numbers on tickets or read those license numbers.

In regard to claim 6 to 9 Mehdipour does not disclose numbering of tickets or time marking of tickets.

The Applicant does not agree that Mehdipour computer software teaches or discloses anything relevant to the claimed subject matter. It seems to be an accounting system in which license plate numbers are manually entered. There seems to be no machine entry of data from a license plate reader or from a ticket machine. In Mehdipour there is no information associated with the ticket with which to match an exit identification (license plate number).

Reconsideration and allowance are respectfully requested.

Respectfully submitted,

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